

**REQUIRED STATEMENT  
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Patricia T. Werner Case No. 16-34935 Chapter 13

All Cases: Moving Creditor Kingspointe of Naperville Condominium Association Date Case Filed 11/01/2016

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed 02/10/2017

Chapter 7: ☐ No-Asset Report Filed on \_\_\_\_\_

☐ No-Asset Report not Filed, Date of Creditors Meeting \_\_\_\_\_

1. Collateral

a. ☒ Home

b. ☐ Car Year, Make, and Model \_\_\_\_\_

c. ☐ Other (describe) \_\_\_\_\_

2. Balance Owed as of Petition Date \$ Unknown

Total of all other Liens against Collateral \$ Unknown

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in *all* cases) \$ 165,000.00

5. Default

a. ☐ Pre-Petition Default

Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_

b. ☒ Post-Petition Default

i. ☒ On direct payments to the moving creditor

Number of months \_\_\_\_\_ Amount \$ 911.43 + accruing assessments,  
charges, attorney's fees,  
and costs.

ii. ☐ On payments to the Standing Chapter 13 Trustee

Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_

6. Other Allegations

a. ☒ Lack of Adequate Protection § 362(d)(1)

i. ☐ No insurance

ii. ☐ Taxes unpaid Amount \$ \_\_\_\_\_

iii. ☐ Rapidly depreciating asset

iv. ☒ Other (describe) Accruing lien for unpaid association assessments

b. ☒ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)

c. ☒ Other "Cause" § 362(d)(1)

i. ☐ Bad Faith (describe) \_\_\_\_\_

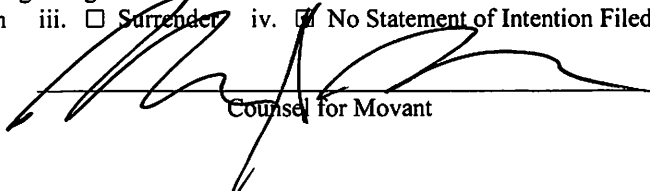
ii. ☐ Multiple Filings

iii. ☒ Other (describe) Default under Movant's Declarations

d. Debtor's Statement of Intention regarding the Collateral

i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☒ No Statement of Intention Filed

Date: March 7, 2019

  
Counsel for Movant